IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA ROCK HILL DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. 0725cr 371
)	18 U.S.C. §§ 2251(a) & (e)
V.)	18 U.S.C. § 2253
)	28 U.S.C. § 2461(c)
)	
)	
DAI QUAN MATTHEW FELIX,)	
a/k/a "Daiquan Felix,")	
a/k/a "Cartel Dequan")	<u>INDICTMENT</u>

COUNT 1

THE GRAND JURY CHARGES:

That on or about October 28, 2024, in the District of South Carolina and elsewhere, the defendant, DAI QUAN MATTHEW FELIX, a/k/a "Daiquan Felix," a/k/a "Cartel Dequan," did knowingly employ, use, persuade, induce, entice, and coerce a minor, Minor victim I, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and which visual depiction was produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit: digital visual depictions of Minor Victim I engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

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FLORENCE, S.C.

FORFEITURE

PRODUCTION OF CHILD PORNOGRAPHY:

Upon conviction for violation of Title 18, United States Code, Section 2251 as charged in this Indictment, the Defendant, **DAI QUAN MATTHEW FELIX**, **aka "Daiquan Felix," aka "Cartel Dequan,"** shall forfeit to the United States his interest in:

- i. any visual depiction described in section 2251, 2251A, 2252 or 2252A of chapter 110 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of chapter 110 of the United States Code;
- ii. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- iii. any property; real or personal, used or intended to be used to commit or to promote the commission of such offense.

PROPERTY:

Pursuant to Title 18, United States Code, Section 2253 and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offense charged in this Indictment includes, but is not limited to, the following:

A. Cellular Phone:

Apple iPhone 14 Plus IMEI - 352073505736398

B. <u>Proceeds/Forfeiture Judgment</u>:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offense charged in this Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to his violation of 18 U.S.C. § 2251.

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- cannot be located upon the exercise of due diligence; (a)
- has been transferred or sold to, or deposited with, a third person; (b)
- has been placed beyond the jurisdiction of the Court; (c)
- has been substantially diminished in value; or (d)
- has been commingled with other property which cannot be subdivided (e) without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the Defendant up to an amount equivalent to the value of the above-described forfeitable property;

All pursuant to Title 18, United States Code, Section 2253 and Title 28, United States Code, Section 2461(c).

BILL FOREPERSON

BROOK B. ANDREWS

ACTING UNITED STATES ATTORNEY

By:

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